

**FEDERAL PUBLIC DEFENDER  
DISTRICT OF NEW JERSEY**

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Hon. Cathy L. Waldor  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

March 15, 2021

Re: *United States v. Maria Bell*, Case No. 2:20-mj-9451

Dear Judge Waldor:

The defense respectfully requests that the Court schedule a bond hearing in this case as soon as possible. It has been 10 days since the Court held a conference to discuss, among other things, its authority to consider the instant motion for bond. As noted during that conference, the defense's position is that if Your Honor did not have such authority, the District Court would not have stated at the end of its last Order: "Should she wish the Court to consider a renewed motion for pretrial release, Defendant may file the appropriate motion with the magistrate judge." *United States v. Maria Bell*, Case No. 2:21-cr-15, ECF No. 11 at 3 (Mar. 1, 2021). The defense submits that further delay in deciding the instant motion is unnecessary and manifestly unfair to Ms. Bell.

Ms. Bell has spent 3 months and 19 days incarcerated since her arrest on November 25, 2020, for a crime that carries no mandatory minimum sentence, a maximum of ten years in prison, and is not alleged to have been motivated by a desire to harm a single person on the planet. All after Ms. Bell has spent 53 years overcoming adolescent trauma, raising two wonderful adult sons, taking care of her infant grandchild, working for years as a research coordinator at a hospital, mentoring students at William Paterson University, and never having been accused of a single crime, not even speeding. Her partner and sons are willing to allow the Court to secure all of the property they own, and to co-sign unsecured bonds, and to submit to monitoring of a personal laptop belonging to her partner, simply to allow her to be incarcerated *at home* while she is purportedly presumed innocent. The defense has spent months litigating this issue; at each hearing, new reasons have been given for continuing to incarcerate Ms. Bell. Now, the defense and her loved ones have spent weeks gathering all of the necessary documents to put Ms. Bell's home, her vehicle, and all of their vehicles up for a secured bond.

Given Ms. Bell's history, given the absence of any indication that she will disobey the Court's orders, given the sacrifices her sons and partner have made, given the lengthy time she has been incarcerated while *innocent*, the Court's continued delay is unreasonable and a hearing should be scheduled forthwith. We merely ask for a full day's notice so her sons and her partner can try to be present for the hearing and answer any questions the Court may have.

Respectfully submitted,

/s/ Rahul Sharma, AFD

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